

Philip S. Van Der Weele, OSB #863650  
Email: phil.vanderweele@klgates.com  
K&L GATES LLP  
222 SW Columbia Street, Suite 1400  
Portland, OR 97201  
Phone: (503) 228-3200 / Fax: (503) 248-9085  
*Attorneys for Defendant Orion Processing, LLC*

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON (PORTLAND)

STATE OF OREGON, ex rel. ELLEN F.  
ROSENBLUM, Attorney General for the State  
of Oregon, and PATRICK M. ALLEN, Director  
of the Department of Consumer and Business  
Services,

Plaintiff,

v.

SWIFT ROCK FINANCIAL, INC., d/b/a  
World Law Direct, World Law Group, World  
Law Plan, World Law Debt Settlement, World  
Law Debt Services, World Law Options, and  
World Law Debt Assistance, a Texas  
corporation; and

ORION PROCESSING, LLC, d/b/a World  
Law Processing and WLD Credit Repair, a  
Texas limited liability company,

Defendants.

Case No. 3:13-cv-01352-MO

**DEFENDANT ORION  
PROCESSING, LLC'S  
MEMORANDUM IN SUPPORT OF  
UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO  
ANSWER AND TO STRIKE  
DEADLINES IN DISCOVERY AND  
PRETRIAL SCHEDULING ORDER**

PAGE 1 – DEFENDANT ORION PROCESSING, LLC'S  
MEMORANDUM IN SUPPORT OF UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO ANSWER AND TO STRIKE  
DEADLINES IN DISCOVERY AND PRETRIAL SCHEDULING  
ORDER

This motion of defendant Orion Processing, LLC (“Orion”) arises out of the stated intention of the State of Oregon to move to remand this case to state court on the ground that diversity jurisdiction does not exist. Counsel for Orion and the State of Oregon have conferred and agree that it would be inefficient for the parties and this Court to proceed to litigate this case under the Federal Rules of Civil Procedure and the Local Rules of this Court when there is a chance that the case will be remanded to state court. Counsel have further agreed that, in the event the motion to remand is denied, they will conduct a FRCP 26(f) conference and thereafter, either jointly or separately, propose a new pretrial schedule(s) to the Court.

Accordingly, Orion requests that its motion be granted so that (1) the deadline for defendants to respond to the Complaint is 14 days after this Court’s ruling on the forthcoming motion to remand; and that (2) all of the deadlines in the Discovery and Pretrial Scheduling Order (Doc. #2) are stricken.

Dated this 13th day of August, 2013.

Respectfully submitted,

K&L GATES LLP

By: s/Philip Van Der Weele  
Philip Van Der Weele, OSB #863650  
Attorneys for Defendant Orion Processing, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on August 13, 2013, a true copy of the foregoing DEFENDANT ORION PROCESSING, LLC'S MEMORANDUM IN SUPPORT OF UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER AND TO STRIKE DEADLINES IN DISCOVERY AND PRETRIAL SCHEDULING ORDER was served on the following named person(s) as indicated below:

Jermaine F. Brown, OSB #073415  
District Attorney General  
Department of Justice  
1515 SW Fifth Ave., Suite 410  
Portland, OR 97201  
Tel.: (971) 673-1880 / Fax: (971) 673-1884  
Email: jermaine.f.brown@doj.state.or.us  
Attorneys for Plaintiffs

(Via the Court's ECF Notification System)

Swift Rock Financial, Inc. - Via First Class Mail  
Roger Peugh, Registered Agent  
9011 Mountain Ridge Drive, Suite 220  
Austin, TX 78759

(Via First Class Mail)

Dated this 13th day of August, 2013.

s/Philip Van Der Weele  
Philip Van Der Weele